

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOSEPH PAGAN,

Plaintiff,

v.

**C.I. LOBSTER CORP., JOSEPH
MANDARINO, RICHARD MANDARINO,
and JOHN MANDARINO,**

Defendants.

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CASE NO.: 20-CV-7349 (ALC) (SDA)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying affidavits, memorandum of law, and the pleadings herein, the Plaintiff will move this Court, before the Hon. Stewart D. Aaron, United States Magistrate Judge, for an order conditionally certifying a collective action and approving and authorizing distribution of a notice of collective action lawsuit to putative party plaintiffs and related relief. On February 8, 2022, Plaintiff asked Defendants for the length of time they would seek for opposition, and, on February 9, 2022, Defendants stated March 25, 2022, to which Plaintiff agrees. Plaintiff's reply is due one week later, on April 1, 2022, under Local Rule 6.1.

Dated: February 10, 2022

THE OTTINGER FIRM, P.C.

/s/ Finn Dusenbery
Finn Dusenbery
The Ottinger Firm, P.C.
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*Attorneys for Plaintiff and Putative
Class*